

June 13, 2018

VIA Electronic Mail

Honorable Joel A. Pisano (Ret.)
Walsh Pizzi O'Reilly Falanga, LLP
One Riverfront Plaza
1037 Raymond Boulevard, Suite 600
Newark, NJ 07102

**Re: *In Re: Johnson & Johnson Talcum Powder Products
Marketing, Sales Practices and Products Liability
Litigation, MDL No. 2738***

Dear Judge Pisano:

On June 11, 2018, the parties conferred with your Honor regarding issues surrounding the upcoming 30(b)(6) depositions. Today, Ms. Sharko and I conferred and have reached agreement as follows:

1. The depositions of Donald Hicks, Susan Nicholson and John Hopkins are presumptively to take no more than two days, seven hours per day. The parties shall cooperate during the course of the examination and will refrain from unnecessary colloquy and objections to answers and to questions. In the event the plaintiffs in good faith cannot complete the deposition within the two days designated, they may return to Your Honor with a request for additional time at a time and place convenient for the witness.
2. Plaintiffs are limited to one examiner for each of the discrete deposition topics set forth in the notice as approved by Your Honor.
3. The parties shall identify the questioner(s) who will examine each witness and the attorney(s) defending the witnesses 48 hours in advance of the scheduled depositions.

Thank you for your consideration of these matters.

Respectfully submitted,

/s/ Michelle A. Parfitt

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So Ordered:



Hon. Joel A. Pisano
Special Master

June 14, '18

Date